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*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

Bankruptcy Case No. 19-30088 (DM)

**PG&E CORPORATION,**

Chapter 11

**- and -**

(Lead Case) (Jointly Administered)

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

**REORGANIZED DEBTORS' REPORT ON  
RESPONSES TO NINETEENTH  
SECURITIES CLAIMS OMNIBUS  
OBJECTION (DUPLICATE CLAIMS) AND  
REQUEST FOR ORDER BY DEFAULT AS  
TO UNOPPOSED OBJECTIONS**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors

[Re: Dkt. No. 11743]

*\* All papers shall be filed in the Lead  
Case, No. 19-30088 (DM).*

**Resolving Objections Set for Hearing  
February 2, 2022 at 10:00 a.m. (Pacific Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as  
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the  
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-  
5 1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of  
6 California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*  
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Docket No. 1996], that  
8 the Court enter an order by default on the *Reorganized Debtors’ Nineteenth Securities Claims Omnibus*  
9 *Objection (Duplicate Claims)* [Docket No. 11743] (the “**Nineteenth Securities Claims Omnibus**  
10 **Objection**”).

11 **RELIEF REQUESTED IN THE**  
12 **NINETEENTH SECURITIES CLAIMS OMNIBUS OBJECTION**

13 The Nineteenth Securities Claims Omnibus Objection seeks to disallow and expunge certain  
14 proofs of claim that duplicate others submitted in the Chapter 11 Cases. The claims subject to the  
15 Nineteenth Securities Claims Omnibus Objection are listed in **Exhibit 1** to that Objection.

16 **NOTICE AND SERVICE**

17 The Reorganized Debtors filed the *Notice of Hearing on Reorganized Debtors’ Nineteenth*  
18 *Securities Claims Omnibus Objection (Duplicate Claims)* [Docket No. 11745] (the “**Notice of**  
19 **Hearing**”). The Nineteenth Securities Claims Omnibus Objection was supported by the *Declaration of*  
20 *Justin R. Hughes in Support of Reorganized Debtors’ Nineteenth Securities Claims Omnibus Objection*  
21 *(Duplicate Claims)* [Docket No. 11744] (the “**Hughes Declaration**”). The Nineteenth Securities Claims  
22 Omnibus Objection, the Notice of Hearing, and the Hughes Declaration were served as described in the  
23 *Certificate of Service* of Sonia Akter, filed on January 4, 2022 [Docket No. 11790] (the “**Certificate of**  
24 **Service**”). As further described in the Certificate of Service, on December 22, 2021, each holder of a  
25 claim listed on **Exhibit 1** to the Nineteenth Securities Claims Omnibus Objection received a notice  
26 including the claim number, debtor, claim amount, and the basis for the Reorganized Debtors’ objection  
27 with respect to the applicable claim to be disallowed and expunged.  
28

The deadline to file responses or oppositions to the Nineteenth Securities Claims Omnibus Objection has passed. The Reorganized Debtors have received the following responses:

Docket No.	Claimant	Claim Nos.	Resolution
Informal	Kingfishers L.P.	98962	The Reorganized Debtors have discussed the informal response with counsel for claimant and claimant does not oppose the Nineteenth Securities Claim Omnibus Objection or the disallowance and expungement of Claim No. 98962. Both claimant and the Reorganized Debtors reserve all rights with respect to Claim No. 98960.

**DECLARATION OF NO OPPOSITION RECEIVED**

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

- I am a member of the law firm of Weil, Gotshal & Manges LLP (“Weil”), counsel for the Reorganized Debtors.
- The Court’s docket in the Chapter 11 Cases has been reviewed and Weil has determined that no responses have been filed with respect to the Nineteenth Securities Claims Omnibus Objection except as described herein.

WHEREFORE, the Reorganized Debtors hereby request entry of an order disallowing and expunging the proofs of claim listed in the column headed “Claim to be Disallowed and Expunged” in **Exhibit A** to this Request, which listed claims identical to those in **Exhibit 1** to the Nineteenth Securities Claims Omnibus Objection, except as otherwise discussed above.

Dated January 26, 2022

**WEIL, GOTSHAL & MANGES LLP**

**KELLER BENVENUTTI KIM LLP**

By: /s/ Richard W. Slack

Richard W. Slack

*Attorneys for Debtors and Reorganized Debtors*